

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

*Plaintiff,*

v.

SAMSUNG ELECTRONIC CO., LTD and  
SAMSUNG ELECTRONICS AMERICA, INC.,

*Defendants.*

Case No. 2:23-CV-00103-JRG-RSP

**DEFENDANTS UNOPPOSED MOTION TO EXCUSE LEAD COUNSEL  
FROM OCTOBER 2, 2024 DISCOVERY HEARING**

Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung” or “Defendants”) respectfully file this Unopposed Motion to Excuse Lead Counsel from the October 2, 2024, Discovery Hearing.

The Court recently set a hearing for October 2, 2024, on certain discovery motions. *See* Text Notice of Hearing (Sept. 24, 2024). Pursuant to this Court’s Standing Order Regarding “Meet and Confer” Obligations Relating to Discovery Disputes dated March 11, 2020, “each party’s lead attorney shall attend any discovery motions hearings set by the Court.” (*See also* Dkt. No. 56 at ¶9(d) (Discovery Order)). Lead counsel for Defendants, Ruffin B. Cordell, is currently unable to attend the October 2 conference. Accordingly, Samsung respectfully requests that the Court enter an order excusing Mr. Cordell from attending the October 2 discovery hearing, and requests that Thad C. Kodish of Fish & Richardson P.C. and Melissa R. Smith of Gillam & Smith LLP be allowed to act as lead counsel with full decision-making authority at the hearing in place of lead counsel. Counsel for Defendants has conferred with counsel for Plaintiff, and counsel for Plaintiff has indicated that Plaintiff is unopposed to the relief sought in this Motion.

WHEREFORE, Defendants respectfully request that the Court enter an order excusing Mr. Cordell from attending the October 2, 2024, discovery hearing.

Dated: September 27, 2024

Respectfully submitted,

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**SAMSUNG ELECTRONICS CO., LTD. AND**

**SAMSUNG ELECTRONICS AMERICA, INC.**

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff and counsel for Defendants have met and conferred in compliance with Local Rule CV-7(h). Plaintiff does not oppose this motion.

/s/ John W. Thornburgh  
John W. Thornburgh

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on September 27, 2024. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ John W. Thornburgh  
John W. Thornburgh